

**LOCAL BANKRUPTCY FORM 2016-2(b)****IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****IN RE:** BRETT MICHAEL HARER**CHAPTER 13****Debtor(s)****CASE NO.** 4:23-BK-01767-MJC**APPLICATION OF ATTORNEY FOR CHAPTER 13 DEBTOR  
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

(Name of applicant) Paul D. Murphy-Ahles applies for approval of compensation as Chapter 13 Debtor(s)' counsel and for reimbursement of expenses pursuant to 11 U.S.C. § 330 as follows:

1. Applicant is counsel for Debtor(s) Brett Michael Harer
2. Debtor(s) filed a petition for bankruptcy relief on 08/03/2023 (date).
3. Applicant previously filed a Disclosure of Compensation of Attorney for Debtor(s) pursuant to Fed. R. Bankr. P. 2016(b), which is attached as Exhibit "A" to this Application.
4. This Application is Final (state whether an interim or final application).
5. (Check all applicable items)
  - ☐ a. Debtor(s)' Chapter 13 Plan was confirmed on (date).
  - ☐ b. The order approving the last post-confirmation modification on Debtor(s)' confirmed Chapter 13 plan was entered on (date).
  - ☒ c. Debtor(s) have not confirmed a Plan.
6. The dates and amounts of previous compensation paid are:
  - a. as a retainer \$368.00 on 08/03/2023 (list dates and amounts);
  - b. paid by the Chapter 13 Trustee through a confirmed Plan (list dates and amounts);  
N/A
  - c. other  
(describe source, amount and date paid).
7. Compensation previously approved by the Court following the filing of an interim Application are: (dates and amounts)  
N/A

8. If Applicant has not agreed with Debtor(s) to accept the Presumptively Reasonable Fee ("PRF"), or is filing a supplemental fee application, Applicant requests compensation in the amount of \$ 4,632.00 and reimbursement of expenses in the amount of \$ 0.00 for the period of 08/03/2023 to 03/22/2024 . A chronological listing of services performed and itemization of expenses for which reimbursement is requested for this time is attached as Exhibit "B" to this Application.
9. Legal services were performed by all professionals at the hourly rates set forth at the beginning of the chronological listing of services provided on Exhibit "B."
10. *(Check one)*
- ☒ Debtor(s) have reviewed this Application prior to its filing and have approved the requested amounts.
- ☐ Debtor(s) have reviewed this Application prior to its filing and have not approved the requested amounts.
- ☐ Debtor(s) have not reviewed this Application prior to its filing.
- ☐ Debtor(s) have not approved the requested amounts.
11. Objections are pending to the following prior fee applications: *(list date application was filed and name of objector, if no objections pending state "none")*.
- N/A

WHEREFORE, your Applicant respectfully requests this Honorable Court to approve the requested compensation in the amount of \$ 4,632.00 and reimbursement of expenses in the amount of \$ 0.00 pursuant to 11 U.S.C. § 330, and if this is a Final Fee Application, to determine that all prior interim orders are final.

Dated: 06/04/2024

/s/ Paul D. Murphy-Ahles

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Applicant's Signature

**United States Bankruptcy Court**  
**Middle District of Pennsylvania**

In re Brett Michael Harer

Debtor(s)

Case No. 4:23-BK-01767-MJCChapter 13

**DISCLOSURE OF COMPENSATION OF ATTORNEY FOR DEBTOR(S)**

1. Pursuant to 11 U.S.C. § 329(a) and Fed. Bankr. P. 2016(b), I certify that I am the attorney for the above named debtor(s) and that compensation paid to me within one year before the filing of the petition in bankruptcy, or agreed to be paid to me, for services rendered or to be rendered on behalf of the debtor(s) in contemplation of or in connection with the bankruptcy case is as follows:

For legal services, I have agreed to accept .....	\$	5,000.00
Prior to the filing of this statement I have received .....	\$	368.00
Balance Due .....	\$	4,632.00

2. \$ 313.00 of the filing fee has been paid.
3. The source of the compensation paid to me was:  
☒ Debtor      ☐ Other (specify):
4. The source of compensation to be paid to me is:  
☒ Debtor      ☐ Other (specify):
5. ☒ I have not agreed to share the above-disclosed compensation with any other person unless they are members and associates of my law firm.  
☐ I have agreed to share the above-disclosed compensation with a person or persons who are not members or associates of my law firm. A copy of the agreement, together with a list of the names of the people sharing in the compensation is attached.
6. In return for the above-disclosed fee, I have agreed to render legal service for all aspects of the bankruptcy case, including:
- Analysis of the debtor's financial situation, and rendering advice to the debtor in determining whether to file a petition in bankruptcy;
  - Preparation and filing of any petition, schedules, statement of affairs and plan which may be required;
  - Representation of the debtor at the meeting of creditors and confirmation hearing, and any adjourned hearings thereof;
  - [Other provisions as needed]  
meetings and routine correspondence in connection with the above services.
7. By agreement with the debtor(s), the above-disclosed fee does not include the following service:  
rescheduled or continued 341(a) Meeting of Creditors; creditor maintenance after the filing of Voluntary Petition; Motion(s) for Relief from the Automatic Stay; Motion(s) to Dismiss; Adversary Proceeding(s); Discharge Litigation(s); Motion(s) to Modify Plan(s); Motion(s) to Reconsider; Motion to Convert Case; Motions(s) to Sell Property; Reaffirmation Agreement(s); US Trustee inquiry

**CERTIFICATION**

I certify that the foregoing is a complete statement of any agreement or arrangement for payment to me for representation of the debtor(s) in this bankruptcy proceeding.

\_\_\_\_\_  
Date

\_\_\_\_\_  
/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles 201207

Signature of Attorney

DETHLEFS PYKOSH & MURPHY

2132 Market Street

Camp Hill, PA 17011

(717) 975-9446 Fax: (717) 975-2309

pmurphy@dplglaw.com

\_\_\_\_\_  
Name of law firm



# INVOICE

Invoice # 18712  
Date: 04/30/2024  
Due Upon Receipt

2132 Market Street  
Camp Hill, PA 17011  
Phone: (717) 975-9446  
Fax: (717) 975-2309  
Email: info@dplglaw.com  
www.dplglaw.com

Mr. Brett Michael Harer  
1616 Louisa Street  
Williamsport, PA 17701

## 07183-Harer

### Chapter 13 Bankruptcy

Date	Attorney	Notes	Quantity	Rate	Total
08/03/2023	PDM	A106 Communicate (with client) L140 Document/File Management: email to client with document checklist, information regarding emergency filing and deadlines	0.30	\$400.00	\$120.00
08/03/2023	PDM	A103 Draft/revise L140 Document/File Management: review emergency petition before filing with Court	0.40	\$400.00	\$160.00
08/03/2023	KSG	A103 Draft/revise L140 Document/File Management: finalize emergency Voluntary Petition; file same with Court	0.50	\$150.00	\$75.00
08/03/2023	KSG	A107 (UK) Communicate (Other Party(s)/other outside lawyers) L140 Document/File Management: draft notice to Lycoming County Sheriff regarding bankruptcy filing; serve same via facsimile	0.20	\$150.00	\$30.00
08/03/2023	PDM	A106 Communicate (with client) L140 Document/File Management: email to client providing credit counseling information	0.20	\$400.00	\$80.00
08/04/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding 341 Meeting of Creditors scheduled for September 11, 2023 at 9:00 AM; mail same to client	0.20	\$150.00	\$30.00
08/14/2023	PDM	A106 Communicate (with client) L140 Document/File Management: email to client regarding documentation required to finalize petition with Court	0.20	\$400.00	\$80.00
08/14/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client about correspondence from PA Department of Revenue regarding unfiled tax returns; mail same to client	0.20	\$150.00	\$30.00
08/21/2023	PDM	A104 Review/analyze L140 Document/File Management: review Motion to Dismiss filed by the Standing Chapter 13 Trustee for failure to complete emergency petition with Court	0.20	\$400.00	\$80.00

08/21/2023	PDM	A106 Communicate (with client) L140 Document/File Management: call w/ client requesting update on documentation required to complete petition and unfiled tax returns	0.30	\$400.00	\$120.00
08/21/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding Motion to Dismiss for failure to complete petition; mail same to client	0.20	\$150.00	\$30.00
08/24/2023	PDM	A106 Communicate (with client) L140 Document/File Management: email to client regarding documentation required to finalize petition with Court	0.20	\$400.00	\$80.00
08/25/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding loss mitigation options from Nationstar Mortgage; mail same to client	0.20	\$150.00	\$30.00
08/29/2023	PDM	A103 Draft/revise L140 Document/File Management: finalize voluntary petition and supporting schedules, draft Chapter 13 Plan	1.20	\$400.00	\$480.00
08/31/2023	PDM	A106 Communicate (with client) L140 Document/File Management: meet w/ client to review and sign Petition, Chapter 13 Plan; discuss timeline and the filing of missing tax returns	0.50	\$400.00	\$200.00
08/31/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding 341 Meeting of Creditors rescheduled for October 30, 2024 at 11:00 AM; mail same to client	0.20	\$150.00	\$30.00
09/01/2023	KSG	A103 Draft/revise L140 Document/File Management: finalize Voluntary Petition and supporting schedules, Chapter 13 Plan, Request for Compensation; file same with Court	0.80	\$150.00	\$120.00
09/01/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to USPS regarding Motion for Wage Attachment Order; mail same to employer and client	0.20	\$150.00	\$30.00
09/07/2023	KSG	A103 Draft/revise L140 Document/File Management: finalize Motion for Wage Attachment Order; file same with Court and serve on employer	0.20	\$150.00	\$30.00
09/10/2023	PDM	A106 Communicate (with client) L140 Document/File Management: call w/ client regarding 341 Meeting of Creditors scheduled for September 11, 2023 at 9:00 AM; requested update on unfiled tax returns	0.30	\$400.00	\$120.00
10/24/2023	KSG	A106 Communicate (with client) L110 Fact Investigation/Development: email w/ client regarding 341 Meeting of Creditors scheduled for October 30, 2023 at 11:00 AM	0.20	\$150.00	\$30.00
10/27/2023	PDM	A106 Communicate (with client) L140 Document/File Management: meeting w/ client regarding 341 Meeting of Creditors and unfiled tax returns	0.40	\$400.00	\$160.00
10/27/2023	PDM	A104 Review/analyze L140 Document/File Management: review finalized petition and supporting schedules and Chapter 13 Plan for filing; prepare for 341 Meeting of Creditors scheduled for October 30, 2024 at 11:00 AM	0.40	\$400.00	\$160.00
10/30/2023	PDM	A106 Communicate (with client) L140 Document/File Management: call w/ client regarding adjourned 341 Meeting of Creditors due to unfiled tax returns	0.20	\$400.00	\$80.00
10/30/2023	PDM	A109 Appear for/attend JM30 Hearings: attend 341 Meeting of Creditors; matter adjourned and continued for November 13, 2024 at 11:30 AM	0.40	\$400.00	\$160.00
10/30/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding 341 Meeting of Creditors scheduled for November 13, 2023 at 11:30 AM; mail same to client	0.20	\$150.00	\$30.00
10/30/2023	KSG	A106 Communicate (with client) L110 Fact Investigation/Development: email w/ client regarding 341 Meeting of Creditors scheduled for November 13, 2023 at 11:30 AM	0.20	\$150.00	\$30.00

11/07/2023	PDM	A104 Review/analyze L140 Document/File Management: review Motion for Relief from the Automatic Stay filed by MC Federal Credit Union regarding 2013 GMC Acadia	0.40	\$400.00	\$160.00
11/07/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding Motion for Relief from the Automatic Stay filed by MC Federal Credit Union regarding 2013 GMC Acadia; mail same to client	0.20	\$150.00	\$30.00
11/08/2023	PDM	A106 Communicate (with client) L140 Document/File Management: call w/ client regarding Motion for Relief from the Automatic Stay filed by MC Federal Credit Union regarding 2013 GMC Acadia	0.20	\$400.00	\$80.00
11/08/2023	PDM	A103 Draft/revise L140 Document/File Management: draft Answer to Motion for Relief from the Automatic Stay filed by MC Federal Credit Union regarding 2013 GMC Acadia	0.40	\$400.00	\$160.00
11/08/2023	KSG	A103 Draft/revise L140 Document/File Management: finalize Answer to Motion for Relief from Automatic Stay filed by MC Federal Credit Union regarding 2013 GMC Acadia; file same with Court and serve creditor	0.20	\$150.00	\$30.00
11/13/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding 341 Meeting of Creditors scheduled for December 18, 2023 at 10:30 AM; mail same to client	0.20	\$150.00	\$30.00
11/13/2023	KSG	A106 Communicate (with client) L110 Fact Investigation/Development: email w/ client regarding 341 Meeting of Creditors scheduled for December 18, 2023 at 10:30 AM	0.20	\$150.00	\$30.00
11/24/2023	PDM	A106 Communicate (with client) L140 Document/File Management: call w/ client regarding Motion for Relief from the Automatic Stay filed by Nationstar Mortgage regarding client's personal residence	0.20	\$400.00	\$80.00
11/24/2023	PDM	A104 Review/analyze L140 Document/File Management: review Motion for Relief from the Automatic Stay filed by Nationstar Mortgage regarding client's personal residence	0.40	\$400.00	\$160.00
11/25/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding Motion for Relief from Automatic Stay filed by Nationstar Mortgage regarding client's personal residence; mail same to client	0.20	\$150.00	\$30.00
11/27/2023	PDM	A103 Draft/revise L140 Document/File Management: draft Answer to Motion for Relief from the Automatic Stay filed by Nationstar Mortgage regarding client's personal residence	0.40	\$400.00	\$160.00
11/27/2023	KSG	A103 Draft/revise L140 Document/File Management: finalize Answer to Motion for Relief from Automatic Stay filed by Nationstar Mortgage regarding client's personal residence; file same with Court and serve creditor	0.20	\$150.00	\$30.00
12/05/2023	PDM	A107 (UK) Communicate (Other Party(s)/other outside lawyers) JM30 Hearings: call w/ Attorney Milos Gvozenovic regarding Motion for Relief from the Automatic Stay filed by MC Federal Credit Union regarding 2013 GMC Acadia; Answer will be withdrawn and relief to be granted	0.20	\$400.00	\$80.00
12/07/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding Order granting Motion for Relief from Automatic Stay filed by MC Federal Credit Union regarding 2013 GMC Acadia; mail same to client	0.10	\$150.00	\$15.00
12/13/2023	PDM	A107 (UK) Communicate (Other Party(s)/other outside lawyers) JM30 Hearings: call w/ Attorney Mario Hanyon regarding Motion for Relief from the Automatic Stay filed by Nationstar Mortgage regarding client's personal property; Stipulation to be filed curing arrears	0.20	\$400.00	\$80.00
12/18/2023	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding 341 Meeting of Creditors scheduled for February 12, 2024 at 11:00 AM; mail same to client	0.20	\$150.00	\$30.00

12/18/2023	KSG	A106 Communicate (with client) L140 Document/File Management: email w/ client regarding 341 Meeting of Creditors and unfiled tax returns	0.20	\$150.00	\$30.00
12/21/2023	KSG	A106 Communicate (with client) L110 Fact Investigation/Development: email w/ client regarding 341 Meeting of Creditors scheduled for February 12, 2024 at 11:00 AM	0.20	\$150.00	\$30.00
12/28/2023	PDM	A104 Review/analyze L140 Document/File Management: review and sign Stipulation resolving Motion for Relief from the Automatic Stay filed by Nationstar Mortgage regarding client's personal residence	0.30	\$400.00	\$120.00
01/04/2024	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding Stipulation resolving Motion for Relief from Automatic Stay filed by Nationstar Mortgage regarding client's personal residence; mail same to client	0.10	\$150.00	\$15.00
01/05/2024	PDM	A106 Communicate (with client) L140 Document/File Management: call w/ client reviewing First Amended Plan	0.20	\$400.00	\$80.00
01/05/2024	PDM	A103 Draft/revise L140 Document/File Management: draft First Amended Plan	0.40	\$400.00	\$160.00
01/06/2024	KSG	A103 Draft/revise L140 Document/File Management: finalize First Amended Plan, draft Notice and Certificate of Service, file same with Court and serve on creditors	0.30	\$150.00	\$45.00
01/06/2024	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding First Amended Plan; mail same to client	0.10	\$150.00	\$15.00
01/12/2024	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding mortgage assistance representative with Nationstar Mortgage; mail same to client	0.20	\$150.00	\$30.00
01/31/2024	PDM	A106 Communicate (with client) L140 Document/File Management: call w/ client requesting update on unfiled tax returns and 341 Meeting of Creditors scheduled for February 12, 2024 at 11:00 AM	0.20	\$400.00	\$80.00
02/11/2024	PDM	A101 Plan and prepare for L450 Trial and Hearing Attendance: prepare for 341 Meeting of Creditors scheduled for February 12, 2024 at 11:00 AM	0.30	\$400.00	\$120.00
02/12/2024	PDM	A101 Plan and prepare for L450 Trial and Hearing Attendance: attend 341 Meeting of Creditors; client did not appear; matter adjourned and notice of failure to appear to be filed requesting dismissal of case	0.30	\$400.00	\$120.00
03/08/2024	PDM	A104 Review/analyze L140 Document/File Management: review Order dismissing case	0.10	\$400.00	\$40.00
03/08/2024	KSG	A106 Communicate (with client) L140 Document/File Management: draft letter to client regarding case dismissal; mail same to client	0.20	\$150.00	\$30.00
03/19/2024	KSG	A107 (UK) Communicate (Other Party(s)/other outside lawyers) L140 Document/File Management: review email from Donna Schott with the Standing Chapter 13 Trustee's office regarding termination of client's wage attachment	0.10	\$150.00	\$15.00
03/20/2024	KSG	A103 Draft/revise L140 Document/File Management: draft Motion for Termination of Wage Attachment Order; file with Court and serve same on employer	0.20	\$150.00	\$30.00
03/22/2024	KSG	A103 Draft/revise L140 Document/File Management: draft letter to USPS regarding Order granting Motion for Termination of Wage Attachment Order; mail same to client and employer	0.20	\$150.00	\$30.00

**Subtotal \$4,780.00**

**Total \$4,780.00**